

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

CHRIS MARTIN,	)	
	)	
Plaintiff,	)	CASE NO. 1:23-cv-02312
v.	)	
	)	
CLEVELAND CITY COUNCIL, <i>et al.</i> ,	)	JUDGE CHARLES ESQUE FLEMING
	)	
Defendants.	)	
	)	
	)	
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**DECLARATION OF JOAN MAZZOLINI**

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Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. My name is Joan Mazzolini. I am more than 18 years of age, and I am competent to make this declaration.

2. I am currently the Chief of Communications for Cleveland City Council and I have held this role for around eight years. Before that, I primarily worked in the news industry as a reporter. I have around 30 years of media experience. I also have a Master's degree from Northwestern University and a Bachelor's degree from The Ohio State University.

3. In my current role as the Chief of Communications, I provide public relations support to Cleveland City Council and its members. This includes, among other things, overseeing press releases and answering media questions. I am also involved in City Council's public comment period. I help to monitor City Council's requirement that potential speakers preregister and that public comment is limited to the first ten registrants.

4. An individual may register to speak at a City Council meeting through the online

portal, or by downloading and emailing the form, or in-person.

5. The online portal to register to speak at a City Council meeting opens at noon on the Wednesday before City Council's regular Monday evening meeting. Registrants fill out the information. Once submitted, a copy of that information is sent to the public comment email inbox that I have access to.

6. The registration portal is set to automatically close at 2 p.m. on the Monday before the City Council meeting. City Council limits the public comment period to ten speakers. So if ten individuals register before Monday at 2 p.m., then I will close the portal. This prevents more people from registering. In-person registration is used very infrequently.

7. For the last few months or so, registration has filled very quickly, often within minutes of opening.

8. On Wednesday, January 3, 2024, the portal opened at noon so that people could register to speak at the Monday, January 8, 2024, City Council meeting.

9. Nine people registered to speak through the online portal within a few minutes; one person registered by emailing the form. I received an email notification for each registration. I then closed the portal after I was aware that ten or more people registered to speak. This happened around 12:05 p.m. on January 3, 2024. No one attempted to register in-person that day.

10. Chris Martin did not register on January 3, 2024, either online, by email or in-person.

11. Under City Council's registration requirement and ten-person limit, this means that Chris Martin could not have properly participated in City Council's January 8, 2024 public comment period.

12. I did receive an email sent to my personal work email on January 8, 2024 from

Chris Martin.

13. Chris Martin did not ask to speak at the meeting. Instead, he asked for the names of those who registered to speak. I sent him those names on or about January 9, 2024.

14. I have reviewed the portal submissions between today and September 26, 2023. Chris Martin has not registered to speak at a City Council meeting during this period.

15. In my role as the Chief of Communications, I also help manage other aspects of City Council's public comment policy. The policy has been removed from City Council's website. It is no longer distributed to speakers before meetings. Additionally, while at one time the online registration referenced the policy, that is no longer the case.

16. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12 day of January 2024.

  
Joan Mazzolini